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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

DECLARATION OF JUAN C. CHAVEZ

I, Juan C. Chavez, submit the following declaration:

I am the counsel of record for the Mental Health Alliance, and I make this declaration in support of the Mental Health Alliance's November 2022 Status Report for the purpose of identifying exhibits. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

DECLARATION OF JUAN C. CHAVEZ

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1. **Exhibit 1** is the written report by MHA member Jonathan Brown.

**I hereby declare that above statement is true to the best of my knowledge and belief,  
and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.**

DATED: November 8, 2022.

/s/ Juan C. Chavez  
Juan C. Chavez, OSB #136428

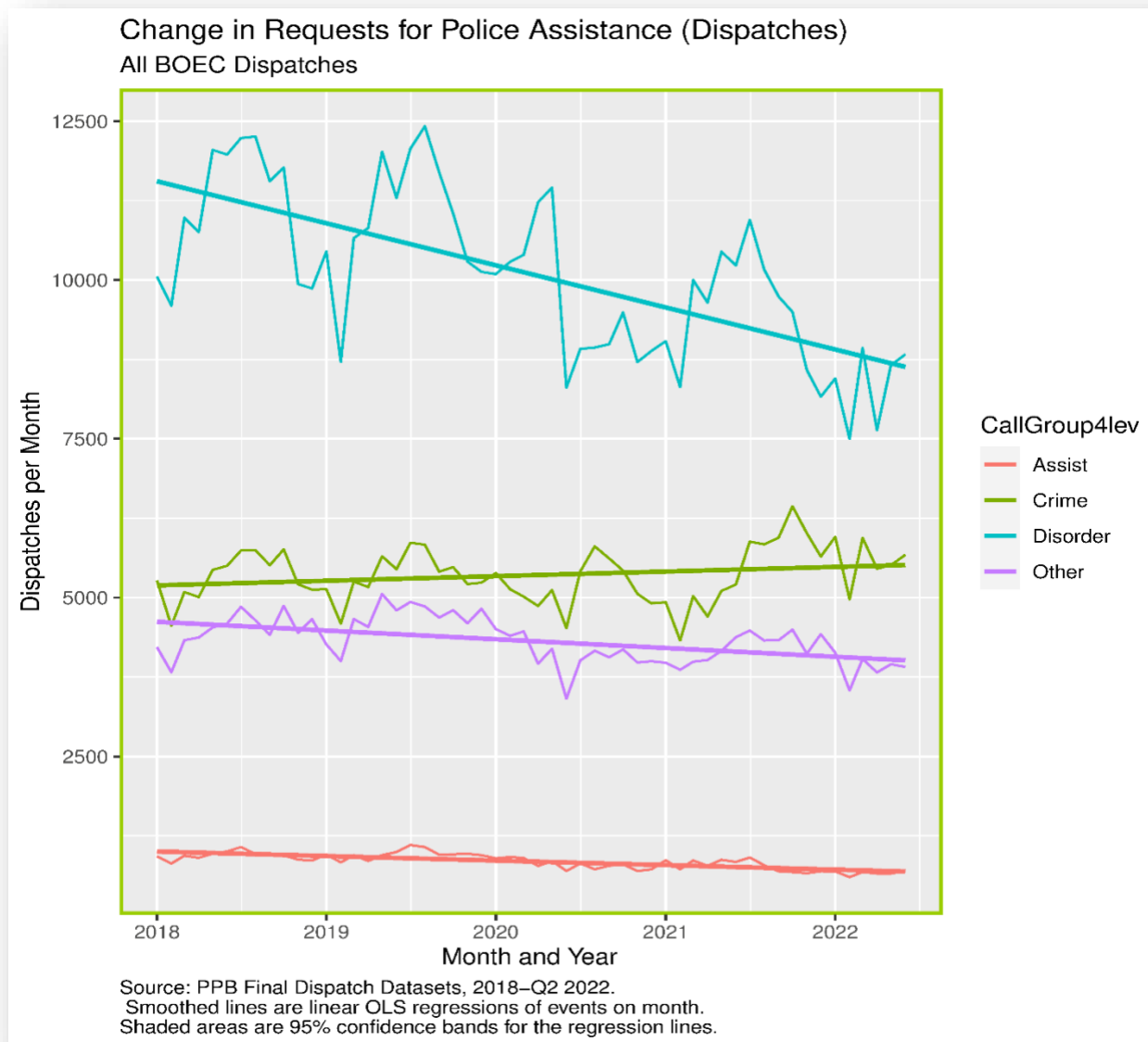
# **New Results on Use of Force and the Mentally Ill**

Findings of

Jonathan Betz Brown, MPP, PhD

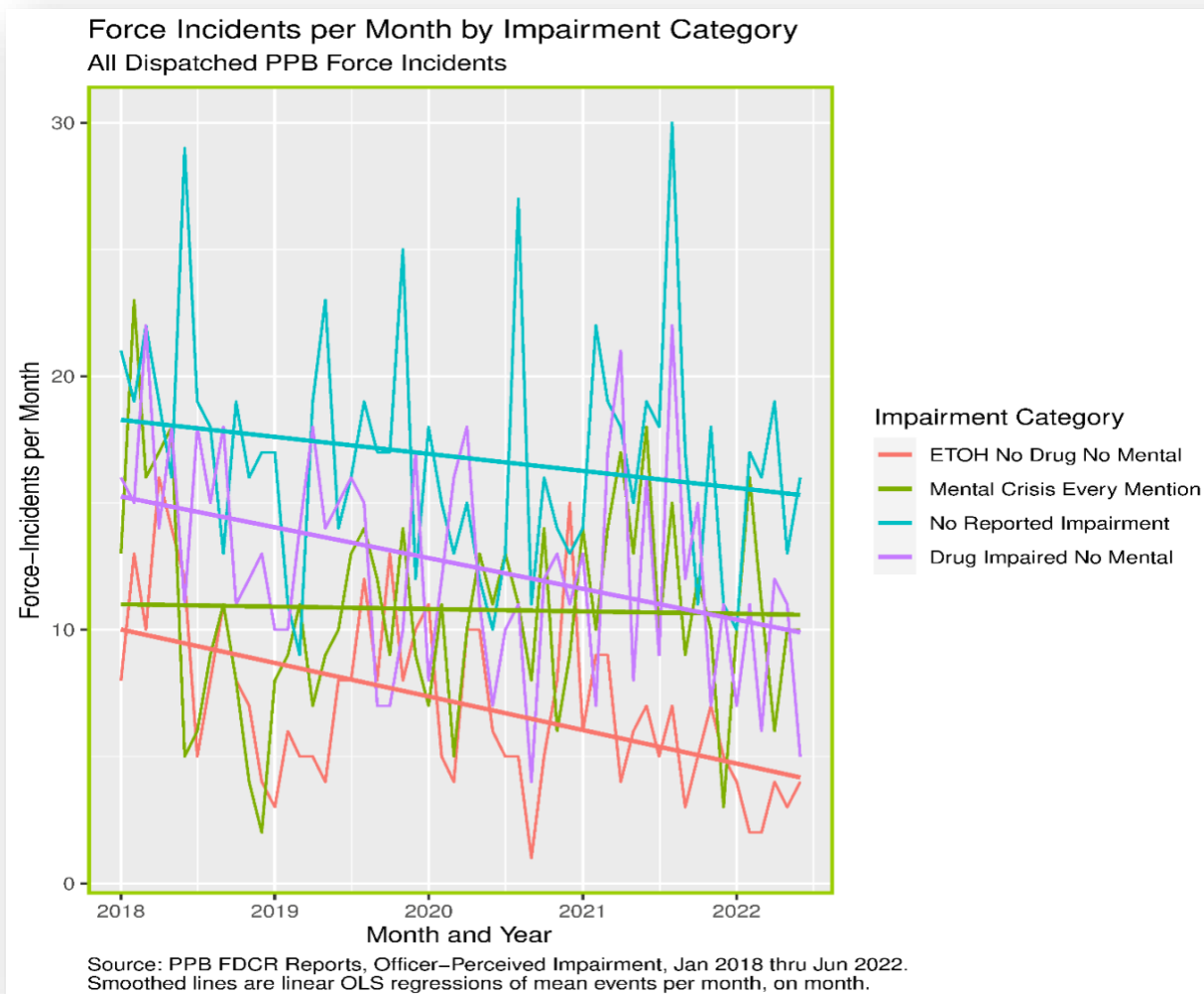
Member of the Mental Health Alliance

## Calls for Police Help have Decreased Steadily.



**The decrease includes calls for assistance**, which is the dispatch category in which most mental health-crisis force-events are found.

**Uses of Force involving Mental Health Crises have Not Decreased, although force incidents have dropped for all other categories.**



Despite a steady decline in police dispatches overall, **force-incidents during a mental crisis have not declined.**

**This failure to decrease is unique** to mental-crisis force-incidents.

- incidents **decreased substantially** for drug impairment, alcohol impairment, and non-impairment

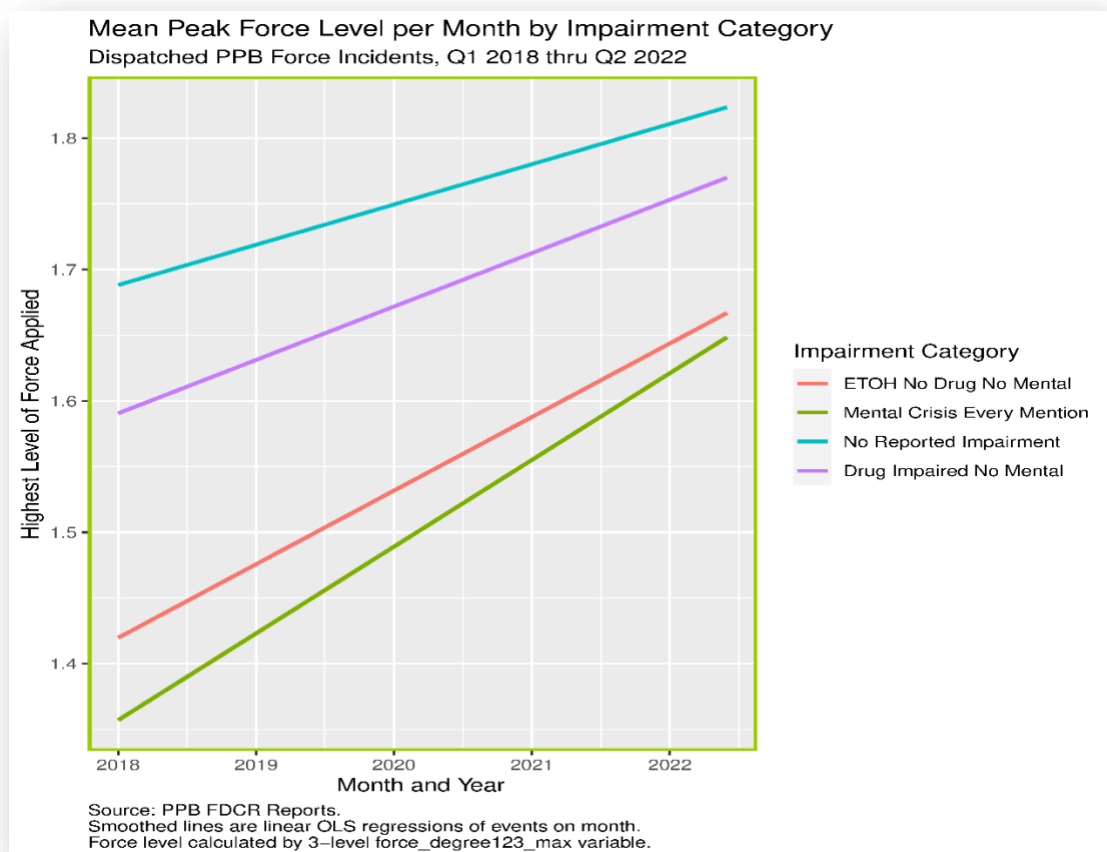
## The Peak Intensity of Force has Grown

During mental-crisis force-incidents, as I reported in April 2022, the **intensity or level of police use-of-force increased steadily** since 2017.

- This is true using *PPB Directive 1010.00* or other scoring systems.

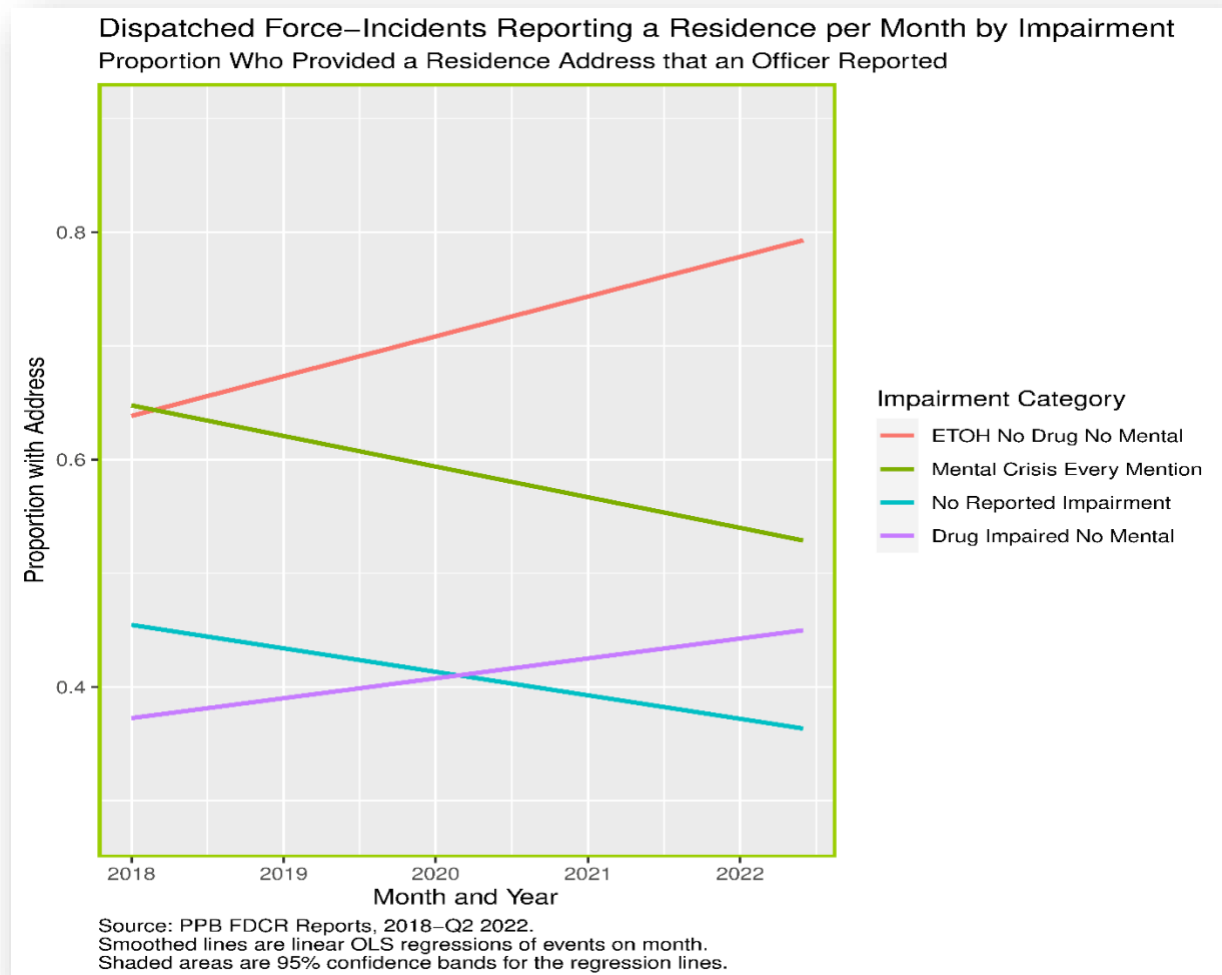
There is a **general shift toward higher-impact uses of force in ALL force-incidents**. Tasers, striking-kicking, pepper spray, and hard takedowns are increasingly reported. Hobbles, gun-pointing, strong control, and soft takedowns have declined.

**Peak force** was and still is **lower** in **mental health-crisis incidents**, but **peak force has grown the most** against people in, or believed to be in, mental health crises, esp. **pepper spray** and **hard takedowns**



## The proportion of persons in mental health-crisis reporting a residential address has dropped substantially.

A citizen's decision to reveal an address to an officer is not a precise indicator of having residential shelter. But changes in this statistic are probably sensitive to changes in the rate of having a safe place to live.



Houselessness exacerbates mental illness. Severe mental illness can lead to houselessness. Oregon's mental healthcare system is ranked among the nation's very worst.